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7 Attorneys for FRANCIS BURGA;
 FRANCIS BURGA AS THE
 8 ADMINISTRATOR OF THE
 ESTATE OF MARGELUS BURGA
 9

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN JOSE DIVISION**

13 UNITED STATES OF AMERICA,

14 Petitioner,

15 v.

16 FRANCIS BURGA; FRANCIS BURGA AS
 THE ADMINISTRATOR OF THE ESTATE
 17 OF MARGELUS BURGA; and RUSSELL
 MANSKY,

18 Respondents.
 19

Case No. 18-CV-01633 BLF (SVK)

**JOINT STIPULATION TO ADOPT
 SPECIAL MASTER'S REPORT
 REGARDING RESPONDENTS'
 PRIVILEGE ASSERTIONS**

Judge: Honorable Susan van Keulen

Honorable Beth L. Freeman

20 On December 18, 2019, the Court ordered the Special Master to provide a written report
 21 containing his recommended resolution of the parties' disputes regarding Respondents' privilege
 22 claims and any exceptions asserted by the Government with respect to such claims by January 31,
 23 2020. In addition, the Court ordered the parties to file objections to or a motion to adopt or
 24 modify the Special Master's report by February 14, 2020. The Special Master submitted his report
 25 to the parties which was filed under seal with the Court on February 3, 2020.
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The parties have reviewed the Special Master’s Report and have conferred and have no objections to the Special Master’s Report. Accordingly, the parties stipulate that the Special Master’s report should be adopted by the Court and that Respondents shall produce to the Government, fully or in redacted form, as appropriate, any documents identified in the Special Master’s Report as not privileged or only partially privileged, by February 28, 2020.

DATED: February 14, 2020

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill
Jay R. Weill

Attorneys for FRANCIS BURGA; FRANCIS BURGA AS THE ADMINISTRATOR OF THE ESTATE OF MARGELUS BURGA

DATED: February 14, 2020

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

By: /s/ Amy Matchison
AMY MATCHISON
Trial Attorney, Tax Division
United States Department of Justice

Attorneys for the United States of America

ATTESTATION

22 Pursuant to Civil Local Rule 5.1., I hereby attest that all counsel represented by conformed
23 signatures above have concurred in the filing of this Stipulation.

24 | DATED: February 14, 2020

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill